

EXHIBIT

S

Declaration of Peter C. Salerno
In Opposition to Plaintiffs' Motion to Compel
Against Yassin Abdullah Kadi

03 MDL 1570

January 2018



Peter Salerno <peter.salerno.law@gmail.com>

RE: # of documents that are work product only

1 message

Andrew J. Maloney <AMaloney@kreindler.com>

Wed, Sep 20, 2017 at 3:05 PM

To: Peter Salerno <peter.salerno.law@gmail.com>, "Carter, Sean" <scarter1@cozen.com>, "Jerry S. Goldman" <jgoldman@andersonkill.com>, Jim Kreindler <JKreindler@kreindler.com>, zRobert Haefele <rhaefele@motleyrice.com>, zScott Tarbutton <starbutton@cozen.com>

Cc: Amy Rothstein <amyrothsteinlaw@gmail.com>, "Steven R. Pounian" <Spounian@kreindler.com>

Peter,

Thank you for the below. We are in the process of finishing the index for the recent production by the PEC identifying responsive documents and hope to have that to you today.

Given the number of documents you produced however, we still have lots of work to do to review the Kadi production regarding gaps and the privilege log. We recognize your representation that he claims to have nothing more that is responsive. Rather than file a motion before finishing this review, that will not be finished by the Oct 13 date the Court set for a response, we would prefer to finish a thorough review and confer with you on all issues by Nov.

I am also scheduled to be out of the country the first 11 days of Oct.

In this regard, would you consent to a Dec. 1 date for either side to file any motion with the Court concerning the productions by each side?

Regards,

Andrew

From: Peter Salerno [mailto:peter.salerno.law@gmail.com]

Sent: Saturday, September 16, 2017 2:08 PM

To: Andrew J. Maloney <AMaloney@kreindler.com>; Carter, Sean <scarter1@cozen.com>; Jerry S. Goldman <jgoldman@andersonkill.com>; Jim Kreindler <JKreindler@kreindler.com>; zRobert Haefele <rhaefele@motleyrice.com>; zScott Tarbutton <starbutton@cozen.com>

Cc: Amy Rothstein <amyrothsteinlaw@gmail.com>

Subject: # of documents that are work product only

In my letter of September 6, 2017, at page 2, I erroneously stated that there are five documents in our final privilege log where the privilege type is work product only. The correct number is seven.

Peter

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